

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

SIMMONS BEDDING COMPANY  
Plaintiff

vs.

CHARMAINE STEPHENS, MERCEDES  
JACKSON, LAPORCHA JACKSON,  
AND REGINE JACKSON  
Defendants

Civil Action No.  
04 12379 NMG

**AGREEMENT FOR JUDGMENT**

Now comes the Plaintiff and Defendants and submit this Agreement for Judgment for approval by the Court against the Defendants and in favor of the Plaintiff as follows:

First: The Defendants agree to allow Judgment to enter in favor of the Plaintiff against them in the instant case, which will allow the Plaintiff to settle and disburse to the Defendants a disputed claim in the estimated amount of SIXTY FIVE THOUSAND SEVEN HUNDRED EIGHTY NINE (\$65,789.00) DOLLARS. Second: The funds shall be distributed to the Defendants as follows:

A. The expenses of suit shall be deducted and paid to Simmons' Attorney: Andrea C. Kramer, Esq. B. The net proceeds shall be distributed as follows:

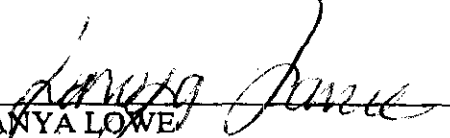
Charmaine Stephens 50%  
Mercedes Jackson, a minor 16 2/3%  
LaPorcha Jackson, a minor 16 2/3%  
Regine Jackson, a minor 16 2/3%

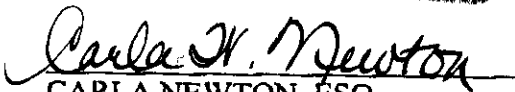
In consideration of this settlement, Ms. Charmaine Stephens agrees to waive any interest she may have in any medical malpractice claim regarding the death of Reginald K. Jackson.


This agreement for Judgment shall be presented to the Court for approval of a good faith settlement between the Plaintiff and the Defendants.

  
CHARMAINE STEPHENS

  
ADOLPHE A. STOREY, ESQ.

  
TANYA LOWE  
MOTHER OF MERCEDES JACKSON  
LAPORCHA JACKSON

  
CARLA NEWTON, ESQ.

  
HOPE GAMBLE, Mother  
REGINE JACKSON

  
FRANK R. SAIA, J.D.